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ATTORNEYS FOR KENT RIES, CHAPTER 7 TRUSTEE

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION**

In re:	§	Chapter 7
	§	
Le-Mar Holdings, Inc., et al.¹,	§	Case No. 17-50234-RLJ
	§	
Debtors.	§	(Jointly Administered)

Kent Ries, as Chapter 7 Trustee of	§	
Le-Mar Holdings, Inc. and	§	
Edwards Mail Service, Inc.,	§	
Plaintiff,	§	
	§	Adversary No. 20-05006-RLJ
v.	§	
	§	
Fast Advance Funding, LLC,	§	
Defendant.	§	

PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT

TO THE HONORABLE ROBERT L. JONES, U.S. BANKRUPTCY JUDGE:

Plaintiff, Kent Ries, Chapter 7 Trustee, moves this Court for a Judgment by Default against the Defendant, Fast Advance Funding, LLC, and would show:

1. Plaintiff filed this adversary proceeding against the Defendant seeking relief pursuant to 11 U.S.C. §§ 502, 547, 548 and 550 Rules 3007 and 7001 of the

¹ The Debtors in these chapter 11 cases are: Le-Mar Holdings, Inc. (Case No. 17-50234-RLJ), Edwards Mail Service, Inc. (Case No. 17-50235-RLJ), and Taurean East, LLC (Case No. 17-50236-RLJ).

Federal Rules of Bankruptcy Procedure.

2. Service was made by re-issued summons issued on July 9, 2020 on the Defendant, in compliance with the Federal Rules of Bankruptcy Procedure Rule 7004.

3. No extension of time was sought by the Defendant.

4. Defendant has failed to file a responsive pleading or motion in response to the Complaint.

5. A default was entered against the Defendant, Fast Advance Funding, LLC, on September 11, 2020 (Doc. No. 13).

6. Plaintiff previously filed an affidavit in support of Plaintiff's Motion for Clerk's Entry of Default (Doc. No. 11, 12) and said affidavit also contains facts establishing grounds for the entry of a Final Default Judgment.

7. Wherefore, Plaintiff seeks a default judgment against the Defendant as a result of the failure to respond.

Dated: September 21, 2020

Respectfully submitted,

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By: /s/ Robert W. St. Clair
Robert W. St. Clair, P.C.
Texas Bar No. 18985300

Attorneys for Plaintiff Kent Ries,
Chapter 7 Trustee

CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of September, 2020, a true and correct copy of the above and foregoing Motion was sent electronically or mailed via regular mail in the United States mail, postage prepaid, to the parties listed below.

/s/ Robert W. St. Clair
Robert W. St. Clair

Defendant at last known addresses:

Fast Advance Funding LLC
ATTN: Joseph (“Joe”) Cole, CFO
205 Arch Street, Floor 2
Philadelphia, Pennsylvania 19106

Fast Advance Funding LLC
c/o Lisa Marie McElhone, Executive Officer
107 Quayside Drive
Jupiter, Florida 33477

Fast Advance Funding LLC
20 N. 3rd Street
Philadelphia, Pennsylvania 19102

Fast Advance Funding LLC
141 N. 2nd Street
Philadelphia, Pennsylvania 19106